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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO WESTERN DIVISION

HOWARD FRANK, Individually and On Behalf of All Others Similarly Situated,) No. 3:05-cv-07393-JGC) (Consolidated)
Plaintiff,)) <u>CLASS ACTION</u>
VS.) Chief Judge James G. Carr
DANA CORPORATION, et al.,)
Defendants.))
)

MOTION FOR ADMISSION PRO HAC VICE FOR SAMANTHA A. SMITH

LANDSKRONER • GRIECO • MADDEN, LLC JACK LANDSKRONER (0059227) 1360 West 9th Street, Suite 200 Cleveland, OH 44113

Telephone: 216/522-9000

216/522-9007 (fax)

Liaison Counsel

COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP MICHAEL J. DOWD DEBRA J. WYMAN 655 West Broadway, Suite 1900 San Diego, CA 92101 Telephone: 619/231-1058

619/231-7423 (fax)

Lead Counsel for Plaintiffs

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NOW COME the movants, SEIU Pension Plans Master Trust, West Virginia Laborer's Pension Trust Fund and Plumbers and Pipefitters National Pension Fund, by and through their counsel, Jack Landskroner of Landskroner • Grieco • Madden, LLC, respectfully requesting an Order be entered permitting attorney Samantha A. Smith to appear *pro hac vice* in the pending matter. In

1. Attorney Smith is in good standing with the California Bar.

support of the motion, movants state as follows:

- 2. At no time has attorney Smith been sanctioned by any court nor disciplined by any association. Nor are there any pending unresolved matters.
- 3. Attorney Smith will abide by all the rules, regulations and procedures of the State of Ohio and will be subject to the contempt citation of the Court.
- 4. Pursuant to Local Rule 83.5(h), the information required for Samantha A. Smith is as follows:

Samantha A. Smith (California Bar No. 233331)
COUGHLIN STOIA GELLER RUDMAN
& ROBBINS LLP
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
ssmith@csgrr.com

DATED: February 13, 2009 LANDSKRONER • GRIECO • MADDEN, LLC

s/ JACK LANDSKRONER

1360 West 9th Street, Suite 200 Cleveland, OH 44113 Telephone: 216/522-9000 216/522-9007 (fax) jack@lgmlegal.com

Liaison Counsel

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COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP MICHAEL J. DOWD DEBRA J. WYMAN 655 West Broadway, Suite 1900 San Diego, CA 92101 Telephone: 619/231-1058 619/231-7423 (fax)

Lead Counsel for Plaintiffs

O'DONOGHUE & O'DONOGHUE LLP LOUIS P. MALONE 4748 Wisconsin Avenue, N.W. Washington, DC 20016 Telephone: 202/362-0041 202/362-2640 (fax)

Additional Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on **February 13, 2009**, a copy of foregoing *Motion for Admission Pro Hac Vice for Samantha A. Smith* was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

s/ JACK LANDSKRONER

JACK LANDSKRONER (0059227)

1360 West 9th Street, Suite 200 Cleveland, OH 44113 Telephone: 216/522-9000

216/522-9007 (fax)

E-mail: jack@lgmlegal.com